

## LERF/ETF Temporary Authorization Request

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The U.S. Department of Energy (DOE), Richland Operations Office (RL) and CH2M Hill Plateau Remediation Company (CHPRC) are requesting that the Washington State Department of Ecology (Ecology) grant a temporary authorization to approve the requested Class 2 modifications to the Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility (LERF/ETF) Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion (Permit), to allow for a change in the monitoring of alarms, leak detectors, and level/pressure indicators associated with permitted tank systems and surface impoundments during periods when ETF processing operations are NOT occurring. Until recently, LERF/ETF has been running fairly continuously since the RCRA permit was issued. Therefore, ETF established permit requirements when it went into final status to monitor effluent processing operations from the control room 24-hours a day. However, in recent years the flow of waste going to ETF has been reduced dramatically, primarily due to liquid waste being treated at the new 200-West Pump-And-Treat facility. As a result of these decreased liquid volumes, ETF will be going to an intermittent processing campaign mode, where ETF will process wastewater over a short time frame (typically 6-8 weeks) then go into standby mode where no waste is processed for several months.

These changes have been discussed with the Department of Ecology over the past few months, and the next ETF waste processing campaign is due to finish on approximately 1/28/2014. Due to shortages in resources and staff, by that time a temporary authorization is requested pursuant to the Washington Administrative Code (WAC) 173-303-830(4)(e) on this submitted permit modification. This TA would allow ETF to shift personnel over to activities associated with LERF cover cleanup during February thru April. These cleanup activities are a high priority for the Department of Ecology and DOE, as well as the Department of Health. After the initial cleanup is complete, these personnel will also be needed to maintain the LERF covers during the spring and summer months, when vegetation growth is the highest.

This attachment reiterates the temporary authorization requirements outlined in the WAC in **bold** and provides the required information. To support staffing changes at LERF/ETF, temporary authorization is requested by **February 1, 2014**

### **WAC 173-303-830(4)(e) Temporary authorizations.**

**(i) Upon request of the permittee, the director may, without prior public notice and comment, grant the permittee a temporary authorization in accordance with this subsection. Temporary authorizations must have a term of not more than one hundred eighty days.**

DOE RL and CHPRC are requesting a temporary authorization for a full term of 180-days. The temporary authorization is needed to support a change from continuous monitoring via personnel stationed in the ETF control room 24-hrs a day, to only monitoring continuously when ETF is receiving aqueous waste, transferring wastewater, or when ETF processing operations are occurring. At all other times, monitoring of alarms is proposed to be once every day.

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**(ii)(A) The permittee may request a temporary authorization for:**

**(1) Any Class 2 modification meeting the criteria in (e)(iii)(B) of this subsection**

The Permittees (DOE RL and CHPRC) are requesting a temporary authorization request that meets the criteria of **WAC 173-303-830(e)(iii)(B)(IV) to prevent disruption of ongoing waste management activities**. A temporary authorization to implement the requested Class 2 modifications to the Permit will allow daily monitoring to proceed when no aqueous waste transfers or ETF processing operations are occurring. This will allow personnel to focus on more critical environmental and operational activities during the planned facility downtime in February thru April, 2014, specifically to focus on the LERF cover cleanup effort.

**(B) The temporary authorization request must include:**

**(I) A description of the activities to be conducted under the temporary authorization:**

The modification request proposes to revise three addenda of the LERF/ETF Hanford Facility RCRA Permit by updating the frequency at which specified alarms, leak detectors, and level/pressure indicators are monitored. Updates will be made in the Process Information, Preparedness and Prevention, and Inspection Requirements addenda.

Instead of continuous monitoring, these changes will allow once a day monitoring of specified alarms, leak detectors, and level/pressure indicators associated with permitted tank systems and surface impoundments during periods when no aqueous waste transfers or ETF processing operations are occurring. During aqueous waste transfers and during ETF processing operations, this monitoring will be continuous as described in the current LERF/ETF Permit language in Addenda C, F, and I.

The permit modification request includes conditions unrelated to monitoring and therefore not included in this temporary authorization request. A table is attached showing all modifications included in the temporary authorization.

**(C) The permittee must send a notice about the temporary authorization request to all persons on the facility mailing list maintained by the director and to appropriate units of state and local governments as specified in WAC 173-303-840 (3)(e)(i)(D). This notification must be made within seven days of submission of the authorization request.**

Permit Condition I.C.3 allows for the Tri-Party Agreement processes to be used at the Hanford Facility for temporary authorization notifications. The notice for the Class 2 modification and the temporary authorization will be made within 7-days after transmitting the request to Ecology.